

**IN THE UNITED STATES BANKRUPTCY COURT FOR THE
WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:

PAMELA GORDON,

Debtor

Case #: 17-24247-CMB

Chapter 13

Related doc: 71

RONDA J. WINNECOUR, CHAPTER 13 TRUSTEE

Movant

v.

Hrg: 12/15/2021, 1:30PM

PAMELA GORDON,

Respondent(s)

RESPONSE TO CHAPTER 13 TRUSTEE'S
MOTION TO DISMISS

1. Admitted.
2. Admitted.
3. Admitted.
4. Denied. As of the date of the filing of this Motion and according to the

Trustee's history of receipts, the Debtor is only in need of \$1,594.00 in order to meet the Plan base.

5. The Debtor still remits payments via an attachment of wages, and estimates that the Plan will be substantially current by the date of the Hearing.

6. By further response, the Debtor is not opposed to a possible extension of the Plan term in order to complete all Plan goals.

WHEREFORE, Debtor respectfully requests this Honorable Court deny the Motion to Dismiss.

Respectfully submitted,

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